

EXHIBIT 15
FILED UNDER SEAL

UNDER PROTECTIVE ORDER

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

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THE STATE OF TEXAS, et)
al.,)
)
Plaintiffs,)
) Civil Action No:
v.) 4:20-CV-957-SDJ
)
GOOGLE LLC,)
)
Defendant.)
_____)

VIDEO RECORDED REMOTE 30(b)(6) DEPOSITION OF
THE STATE OF UTAH
BY MARIE MARTIN

Taken via Zoom
On Tuesday, April 30, 2024
At 2:48 p.m.

Job No. CS6671888
Reported by: Emily A. Gibb, RPR, CSR, CCR
CA CSR #14551, NV CCR #709

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A P P E A R A N C E S

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I N D E X

MARIE MARTIN	PAGE
Examination By Ms. Kaplin	6

* * *

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 11	- Plaintiff States' Amended Advisory Regarding Relief Sought	26
Exhibit 12	- Fourth Amended Complaint	80

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1 first -- they were produced around December, like
2 several months ago.

3 Q. Did the State of Utah issue a document
4 hold -- document legal hold in relation to this
5 action?

6 A. The Utah Office of the Attorney General
7 Antitrust section did not issue a litigation hold
8 letter to the Antitrust section.

9 Q. And the State of Utah AG's Office represents
10 DCP in this action; correct?

11 A. We represent DCP in a outside consult
12 relationship.

13 Q. Did DCP issue a legal hold in this action?

14 A. I am not the designated person to respond to
15 that question. That is the DCP witness that you
16 released several hours ago.

17 Q. Do you know in your personal capacity if DCP
18 issued a legal hold?

19 A. I don't know if they did.

20 Q. And you mentioned earlier today that the AGO
21 received over 10,000 complaints in 2022, over 13,000
22 complaints in 2023, and over 14,000 complaints in
23 2024; is that right?

24 A. That is my understanding based on the
25 discussion I had with Constituent Services, yes.

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REPORTER'S CERTIFICATE

STATE OF UTAH)

)

COUNTY OF UTAH)

I, EMILY A. GIBB, a Certified Shorthand Reporter and Registered Professional Reporter, hereby certify:

THAT I reported the taking of the deposition of MARIE MARTIN, commencing on April 30, 2024, at 2:48 p.m.

THAT prior to being examined, the witness was placed under oath to tell the truth, the whole truth, and nothing but the truth; that the proceedings were taken down by me in shorthand and thereafter my notes were transcribed through computer-aided transcription; and the foregoing transcript constitutes a full, true, and accurate record of such testimony adduced and oral proceedings had, and of the whole thereof.

I further certify that I am in no way related to any of the parties, nor I am I financially interested in the outcome of the case.

() Review and signature was requested.

() Review and signature was waived.

() Review and signature was not requested.

IN WITNESS THEREOF, I have subscribed my name on this 1st day of May, 2024.



Emily A. Gibb, RPR, CSR, CCR